

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commissions's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of Stephen Holland - KD4TTC

I am a licensed amateur radio operator. I have been active on frequencies over 50 MHz, generally on 2 meters and 440. I enjoy the casual contacts and people I meet that way. In terms of public benefit, these contacts keep me skilled in amateur radio communications skills. I have been involved in public safety work, such as with public safety agencies in Birmingham, AL when a disastrous snowfall 2 feet in depth shut down that city. I have also been involved with charity events such as support for large group events such as Multiple Sclerosis fund raising tours.

I am interested in being able to operate below 50 Mhz to extend the skills I have in public safety. In the times I have observed emergency operations at work I have never seen Morse code used as the communications method of choice. It appears that technology is moving towards digital modes. I want to be able to get training in these techniques and work with and possibly even develop computer interfaces to support such work.

Rule 97.1 of the FCC Amateur Radio Service Rules (Basis and purpose) state the

fundamental purposes of the amateur radio service are to provide emergency radio communications, advance the art of radio communications, improve operator skills , expand the number of trained operators, and enhance international goodwill. Presently, the Morse code requirement does not advance or contribute to any of those fundamental purposes enumerated in rule 97.1.

In my particular case, the Morse code requirement is irrelevant to my interests in improving my skills related to emergency communications and in furthering my interest in developing digital communications on HF through computer interfaces. Having the rule in place interferes with my developing digital skills because the time spent being proficient in Morse code takes from time that could be spent in improving other more relevant skills.

Inasmuch as it is a general principal to have in effect the minimal regulations to further the goals of the service, I conclude that the Morse code requirement is now contrary to the purposes of the Amateur service and should be eliminated.

Respectfully submitted,

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